

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**TOMAS HAILEMARIAM,**

**Defendant.**

**Case No. 2:22-CR-109**

**JUDGE MICHAEL H. WATSON**

**DEFENDANT'S UNOPPOSED MOTION TO FILE DOCUMENT UNDER SEAL**

In accordance with S.D. Ohio Civ. R. 5.2.1, as incorporated by S.D. Ohio Crim. R. 1.2, counsel for Defendant Tomas Hailemariam respectfully requests that the Court issue an order permitting him to file his Sentencing Memorandum and its related exhibits under seal for the reasons contained in the attached memorandum.

Respectfully submitted,

*/s/ Michael J. Hunter*

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**MEMORANDUM IN SUPPORT OF MOTION TO FILE DOCUMENTS UNDER SEAL**

Counsel for Defendant Tomas Hailemariam intends to file a Sentencing Memorandum in this matter. As part of its memorandum, counsel intends to discuss sensitive, non-public information. To continue to protect that information, counsel seeks leave from the Court to file its Sentencing Memorandum under seal. Counsel for the government was contacted and has indicated that they do not oppose this motion.

Therefore, Defendant Tomas Hailemariam respectfully requests that the Court issue an Order allowing him to file his Sentencing Memorandum, including any attachments, under seal.

Respectfully submitted,

*/s/ Michael J. Hunter*

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 28, 2025, a copy of the foregoing was filed electronically with the Court using the Court's CM/ECF system. Notice of this filing will be sent to the represented parties by operation of the Court's electronic filing system.

*/s/ Michael J. Hunter*  
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Michael J. Hunter (0076815)

*Attorney for Defendant Tomas Hailemariam*